

EXHIBIT A



FINNEGAN
HENDERSON
FARABOW
GARRETT &
DUNNER LLP

901 New York Avenue, NW ■ Washington, DC 20001-4413 ■ 202.408.4000 ■ Fax 202.408.4400
www.finnegan.com

DONALD R. DUNNER
202.408.4052
don.dunner@finnegan.com

June 28, 2006

Edward R. Reines, Esq.
Weil, Gotshal & Manges LLP
201 Redwood Shores Parkway
Redwood Shores, CA 94065

via email and Federal Express

Telcordia Technologies, Inc. v. Cisco Systems, Inc.

Dear Ed:

Telcordia has concluded that, based on the Court's claim construction of the '306 patent, Telcordia cannot prove infringement of any of the accused products of Cisco based on that patent. Accordingly, Telcordia's expert reports are restricted to the '763 and '633 patents.

As soon as possible, Telcordia will move the Court to enter judgment of non-infringement as to the '306 patent and certify the case under Fed. R. Civ. P. 54(b) so that Telcordia can take an immediate appeal on the Court's claim constructions applicable to the '306 patent. Please advise as to whether Cisco will oppose such a motion.

Best Regards.

Sincerely,

A handwritten signature in dark ink, appearing to read 'Don Dunner'.

Donald R. Dunner

EXHIBIT B

-----Original Message-----

From: edward.reines@weil.com <edward.reines@weil.com>
To: don.dunner@finnegan.com <don.dunner@finnegan.com>
CC: Cherny, Steven (NY); SSinder@kenyon.com <SSinder@kenyon.com>
Sent: Thu Jul 06 00:04:08 2006
Subject: Fw: '306 Proposal

Don,

On June 22, the Court issued its claim construction ruling. The next day Telcordia declared that it would promptly consider how the ruling would affect its infringement allegations. On June 28, Telcordia did acknowledge that its '306 Patent infringement claims were not viable, but only after it failed to meet the Court-ordered deadline for filing expert reports. Within hours, I raised two obvious and central questions:

(1) What claim limitations does Telcordia concede it cannot satisfy for purposes of its ['306 Patent] proposal (and leaving aside for now its total failure to submit expert opinions to support any such infringement claims before the expert disclosure deadline)?

(2) Is Telcordia also proposing to abandon its '306 Patent infringement allegations in the ITC?

Telcordia has repeatedly agreed to respond to these questions quickly -- even expressing urgency in this matter. However, it has been two weeks since the claim construction ruling issued.

Telcordia should reveal its positions. Telcordia cannot be expected to have its claims of urgency taken seriously when it does not act in accordance with such claims. We look forward to a full and complete response.

Best,

Ed

----- Forwarded by Edward Reines/SV/WGM/US on 07/05/2006 08:36 PM

Edward Reines/SV/WGM/US

06/28/2006 05:12 PM

To

"Don Dunner" <don.dunner@finnegan.com>

cc

"Steve Cherny" <Steven.Cherny@lw.com>, "Stuart J. Sinder" <SSinder@kenyon.com>

Subject

'306 Proposal

We are in receipt of your letter late today revealing Telcordia's desire for a Rule 54(b) certification of a non-infringement judgment in relation to the '306 Patent.

As a threshold matter, there is some information we obviously will need to provide an informed response. Given the apparent urgency you attach to your request, we immediately pose two preliminary questions and may have more.

1). What claim limitations does Telcordia concede it cannot satisfy for purposes of its proposal (and leaving aside for now its total failure to submit expert opinions to support any such infringement claims before the expert disclosure deadline)?

(2) Is Telcordia also proposing to abandon its '306 Patent infringement allegations in the ITC?

We look forward to your responses as we begin to consider your request for a Rule 54(b) certification.

Best,

Ed

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